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APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 06/28/22

June 27, 2022

VIA ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**RE: *United States v. Jason Burgos*
22-cr-83 (VSB)**

The status conference scheduled for July 1, 2022 is hereby adjourned to July 29, 2022 at 2:00 p.m. The adjournment is necessary to permit the Defense counsel to conclude a trial in a separate matter, and to permit the parties to continue engaging in potential plea negotiations. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between July 1, 2022 and July 29, 2022 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice. The Clerk of Court is respectfully directed to terminate the motion at docket number 10.

Dear Judge Broderick,

This letter is submitted on behalf of my client, Jason Burgos. Mr. Burgos' next status conference is currently scheduled for Friday, July 1, 2022, at 4:30 pm. It is respectfully requested that the Court grant an adjournment of 30 days for the following reasons.

Firstly, I am currently on trial in the Southern District of New York before the Honorable Sidney H. Stein in *United States v. Constantinescu (Mircea Constantinescu)*, 19-cr-651. That trial began today and is expected to last at least two weeks. Secondly, I am not adopting prior counsel's motion for bond. Finally, the government and I have begun engaging in potential plea negotiations.

The government, through A.U.S.A. Jun Xiang, consents to this request.

Respectfully Submitted,



Meredith S. Heller

Cc: A.U.S.A. Jun Xiang (via ECF)